

**SMITH & LOWNEY, P.L.L.C.**

2317 EAST JOHN STREET  
SEATTLE, WASHINGTON 98112  
(206) 860-2883, FAX (206) 860-4187

November 09, 2019

**Via Certified Mail - Return Receipt Requested**

Managing Agent  
Aero Finishing, LLC  
17925 59th Avenue NE, Suite C  
Arlington, WA 98233

Managing Agent  
Aero Finishing, LLC  
350 North Old Woodward Ave., Suite 100  
Birmingham, MI 48009

**RECEIVED ON:**

*ORC*

**DEC 11 2019**

*NO CMS*

EPA Region 10  
Office of the Regional Administrator

**Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT**

Dear Managing Agent:

We represent Waste Action Project, P.O. Box 9281, Covington, WA 98042, (206) 849-5927. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days' notice of Waste Action Project's intent to file a citizen suit against Aero Finishing, LLC under Section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below.

Aero Finishing, LLC, formerly Metal Finishing, Inc., ("Aero Finishing") has violated and continues to violate the CWA (see Sections 301 and 307 of the CWA, 33 U.S.C. §§ 1311 and 1317) and its CWA Permit No. ST0501293 (the "Permit"), with respect to operations of and discharges of wastewater and pollutants to the City of Arlington sanitary sewer system, and thereby to waters of the state, from its metal finishing facility located at 17925 59th Ave NE, Suite C Arlington, WA 98233 (the "Facility") as described herein. The Permit was issued by the Washington Department of Ecology ("Ecology") on July 27, 2016, effective August 1, 2016, modified on January 6, 2017, and expiring on June 30, 2021.

Aero Finishing has also violated and continues to violate effluent standards and limitations under the CWA (see Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342) with respect to operations and discharges of stormwater associated with industrial activity from the Facility via point source to navigable waters without a National Pollutant Discharge Elimination System ("NPDES") permit authorizing those industrial stormwater discharges. The Facility subject to this notice includes any contiguous or adjacent properties owned or operated by Aero Finishing.

## I. Violations of Pretreatment Permit

The CWA prohibits the discharge of pollutants to navigable waters unless in compliance with the CWA. 33 U.S.C. § 1311. The CWA regulates three categories of point sources: those that discharge pollutants directly to waters, publicly owned treatment works (“POTW”) that treat municipal sewage or industrial wastewater before discharging to navigable waters, and indirect discharges that discharge to a POTW. Indirect discharges are regulated under Section 307 of the Clean Water Act and are prohibited from discharging pollutants in violation of any effluent standard or prohibition or pretreatment standard. 33 U.S.C. §§ 1317(d), 1311(a). Where a POTW develops prohibitions or limits on pollutants pursuant to 40 C.F.R. § 403.5(c), such limits are pretreatment standards for the purposes of Section 307(d) of the Act.

The Permit authorizes Aero Finishing to discharge wastewater to the City of Arlington POTW, which in turn discharges to the Stillaguamish River. The Stillaguamish River is on Ecology’s list of impaired waters because its water quality is limited by turbidity, dissolved oxygen, and temperature.

### A. Effluent Limitations

Condition S1 of the Permit requires that all discharges must comply with the terms and conditions of the Permit and makes it unlawful for Aero Finishing to discharge pollutants more frequently than, or at a concentration in excess of, that authorized by the Permit.

#### 1. pH

Condition S1 of the Permit prohibits discharges with a pH outside the range of 5.5 to 8.0 standard units, measured on a continuous basis and assessed on a daily basis. Aero Finishing has violated this effluent limitation by repeatedly discharging effluent below the minimum pH of 5.5 and above the maximum pH of 8.0 standard units, as identified in the following table:

**Table 1**

Dates or reporting period of violation		Outfall	Discharge pH value (Minimum Limit: 5.5 SU; Maximum Limit: 8.0 SU)
1	November 1, 2018	001	8.4 SU
2	November 2, 2018	001	8.3
3	November 4, 2018	001	8.4
4	November 5, 2018	001	5.4
5	November 5, 2018	001	8.6
6	November 6, 2018	001	5.4
7	November 6, 2018	001	8.7
8	November 7, 2018	001	8.8
9	November 8, 2018	001	9

10	April 17, 2019	001	5.4
11	April 30, 2019	001	5
12	May 25, 2019	001	9.6
13	July 25, 2019	001	8.5

## 2. Copper

Condition S1 of the Permit prohibits daily average copper discharges exceeding 0.50 mg/L. Aero Finishing has violated this effluent limitation by repeatedly discharging effluent with greater daily copper averages than 0.50 mg/L, as identified in the following table:

**Table 2**

	Dates or reporting period of violation	Outfall	Discharge copper concentration (Limit: 0.50 mg/L for daily average)
1	March 19, 2018	001	0.57 mg/L
2	April 18, 2018	001	0.52
3	November 15, 2018	001	0.97
4	January 23, 2019	001	0.92
5	July 23, 2019	001	0.57

Condition S1 of the Permit prohibits monthly average copper discharges exceeding 0.50 mg/L. Aero Finishing has violated this effluent limitation by repeatedly discharging effluent with greater daily and monthly copper averages than 0.50 mg/L, as identified in the following table:

**Table 3**

	Dates or reporting period of violation	Outfall	Discharge copper concentration (Limit: 0.50 mg/L for monthly average)
1	March 2018	001	0.57 mg/L
2	April 2018	001	0.52
3	November 2018	001	0.97
4	January 2019	001	0.61
5	July 2019	001	0.57

## 3. Chromium

Condition S1 of the Permit prohibits daily average chromium discharges exceeding 1.47 mg/L. Aero Finishing has violated this effluent limitation by repeatedly discharging effluent with greater daily chromium averages than 1.47 mg/L, as identified in the following table:

**Table 4**

	Dates or reporting period of violation	Outfall	Discharge chromium concentration (Limit: 1.47 mg/L for daily average)
1	March 19, 2018	001	58 mg/L
2	April 18, 2018	001	12
3	May 16, 2018	001	5.6
4	June 18, 2018	001	9.8
5	July 30, 2018	001	4.4

Condition S1 of the Permit prohibits monthly average chromium discharges exceeding 1.47 mg/L. Aero Finishing has violated this effluent limitation by repeatedly discharging effluent with greater monthly chromium averages than 1.47 mg/L, as identified in the following table:

**Table 5**

	Dates or reporting period of violation	Outfall	Discharge chromium concentration (Limit: 1.47 mg/L for monthly average)
1	March 2018	001	58 mg/L
2	April 2018	001	12
3	May 2018	001	5.6
4	June 2018	001	9.8
5	July 2018	001	4.4

#### 4. Zinc

Condition S1 of the Permit prohibits monthly average discharges exceeding 1.48 mg/L of zinc. Aero Finishing violated this effluent limitation in July 2019 with a monthly average zinc discharge of 1.6 mg/L.

#### B. Monitoring Requirements

##### 1. Flow

Condition S2.A of the Permit requires that Aero Finishing monitor for flow on a continuous basis from outfall 001 using a recording meter. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the flow concentrations from outfall 001 as required, including hundreds of days between August 2016 and April 2019 when it reported the flow from outfall 001 as "0" gpd.

##### 2. pH

Condition S2.A of the Permit requires that Aero Finishing monitor the pH of its wastewater discharges on a continuous basis from outfall 001 using a meter. Aero Finishing



must monitor the final effluent for pH by means of a continuous pH probe/recorder. Aero Finishing must calibrate and maintain the meter and probe in such a manner as to ensure its reliability and accuracy. Calibration and maintenance activities must be recorded in an operator's log. If the continuous pH monitoring system is inoperable, Aero Finishing is authorized to monitor for pH manually using a calibrated pH meter. When pH is monitored manually, a pH reading must be taken at least one time each hour, and the measured pH values must be entered in the operator's log. When pH is continuously monitored, individual pH excursions not exceeding five minutes in duration, within the pH range of 5.0 through 5.49, and individual pH excursions not exceeding five minutes in duration within the pH range 8.01 through 12.0, will not be considered violations (and need not be reported on Discharge Monitoring Reports), provided that the total time which pH values are less than 5.5 or greater than 8.0 does not exceed two hours during the applicable calendar month. This exemption is only applicable to individual pH excursions which do not exceed five minutes in length. Discharges with pHs of less than 5.0 or greater than 12.0 are considered to be violations regardless of duration. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to continuously monitor the pH level of the wastewater from outfall 001. These dates include February 21 and 22, 2018; July 1-25, 2018; and March 16-19, 2019.

Condition S2.A states that the monitoring point for outfall 001 is the discharge of the metal finishing rinse water line at a point at or downstream of the discharge of the pretreatment system, and downstream of the addition of any batch process wastewater discharges, and prior to mixture with sanitary, storm, or non-contact cooling water wastewaters. Aero Finishing is also in violation of Condition S2.A because it fails to monitor the pH of wastewater discharge from outfall 001, rather it monitors the water that is in the last stage at the Facility. These violations occurred every day that there was a pH reading and these violations are reasonably likely to recur until Aero Finishing installs a separate pH monitor and recorder after the pH box at outfall 001.

### 3. Copper

Condition S2.A of the Permit requires that Aero Finishing monitor for copper in its wastewater discharge monthly from outfall 001 using a 24-hour flow proportional composite sample. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the copper concentrations from outfall 001 as required, including for the months of October, November, and December 2017 and January and February 2018. These violations are reasonably likely to recur.

### 4. Chromium

Condition S2.A of the Permit requires that Aero Finishing monitor for chromium in its wastewater discharges monthly from outfall 001 using a 24-hour flow proportional composite sample. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the chromium concentrations from outfall 001 as required, including for the months of October, November, and December 2017 and January and February 2018. These violations are reasonably likely to recur.

5. Zinc

Condition S2.A of the Permit requires that Aero Finishing monitor for zinc in its wastewater discharges monthly from outfall 001 using a 24-hour flow proportional composite sample. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the zinc concentrations from outfall 001 as required, including for the months of October, November, and December 2017, and January and February 2018. These violations are reasonably likely to recur.

6. Cadmium

Condition S2.A of the Permit requires that Aero Finishing monitor for cadmium in its wastewater discharges once each six months from outfall 001 using a 24-hour flow proportional composite sample. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the cadmium concentrations from outfall 001 as required, including during the reporting periods of July through December 2016, January through June 2017, July through December 2017, and January through June 2018. These violations are reasonably likely to recur.

7. Lead

Condition S2.A of the Permit requires that Aero Finishing monitor for lead in its wastewater discharges once each six months from outfall 001 using a 24-hour flow proportional composite sample. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the lead concentrations from outfall 001, including during the reporting periods of July through December 2016, January through June 2017, and July through December 2017. These violations are reasonably likely to recur.

8. Nickel

Condition S2.A of the Permit requires that Aero Finishing monitor for nickel in its wastewater discharges once each six months from outfall 001 using a 24-hour flow proportional composite sample. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the nickel concentrations from outfall 001, including during the reporting periods of July through December 2016, January through June 2017, and July through December 2017. These violations are reasonably likely to recur.

9. Silver

Condition S2.A of the Permit requires that Aero Finishing monitor for silver in its wastewater discharges once each six months from outfall 001 using a 24-hour flow proportional composite sample. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the silver concentrations from outfall 001, including during the reporting periods of July through December 2016, January through June 2017, July through December 2017, and January through June 2018. These violations are reasonably likely to recur.

10. Total Toxic Organic Compounds (“TTO”)

Condition S2.A of the Permit requires that Aero Finishing monitor for total toxic organic compounds in its wastewater discharges once each six months from outfall 001 using a grab sample or to submit a TTO certification statement in lieu of testing. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the TTO from outfall 001 or submit a TTO certification statement in lieu of testing, including during the reporting periods of July through December 2016, January through June 2017, July through December 2017, January through June 2018, and January through June 2019. These violations are reasonably likely to recur.

11. Cyanide

Condition S2.A of the Permit requires that Aero Finishing monitor for cyanide in its wastewater discharges once each six months from outfall 002 using a grab sample. Aero Finishing is in violation of Condition S2.A because it failed and continues to fail to monitor the cyanide concentrations of the wastewater from outfall 002, including during the reporting periods of July through December 2016, January through June 2017, July through December 2017, and January through June 2019. These violations are reasonably likely to recur.

C. Reporting and Recording Requirements

Condition S3.A.1 of the Permit requires that Aero Finishing summarize, report, and submit monitoring data obtained during each monitoring period on electronic Discharge Monitoring Reports (“DMRs”) provided by Ecology within WAWebDMR. Aero Finishing must include data for each of the parameters tabulated in Condition S2 of the Permit and as required by the DMR form. Aero Finishing must report a value for each day sampling occurred (unless specifically exempted in the permit) and for the summary values (when applicable) included on the electronic form.

1. Flow

Permit Conditions S1, S2.A and S3.A.1 require Aero Finishing to report its wastewater discharge flow in gallons per day on monthly DMRs and Condition S3.A.2 of the Permit requires that Aero Finishing use the “no discharge” reporting code for its DMR if Aero Finishing did not discharge wastewater during a given monitoring period. Aero Finishing is in violation of Condition S3.A.2 because it reported the flow from outfall 001 as “0” gpd on hundreds of days between August 2016 and April 2019, as reflected on the Facility’s DMRs. To the extent there was no flow on these dates, Aero Finishing violated the above referenced Permit conditions for failing to use the “no discharge” reporting code. To the extent there was a flow on these dates, Aero Finishing violated the above referenced Permit conditions for failing to report the number of gallons that discharged on those days. These violations continue to occur every time that Aero Finishing reports “0” gpd or are reasonably likely to recur.

2. pH

Condition S3.A of the Permit requires that Aero Finishing report the daily minimum and maximum monitoring data for the pH of the wastewater that discharges via outfall 001 on

monthly DMRs to Ecology. Aero Finishing is in violation of Condition S3.A because it has failed to report the pH of the wastewater from outfall 001 as required, including data from February 21-22, 2018, July 1-25, 2018, and March 16-19, 2018.

Condition S3.A.2 of the Permit requires that Aero Finishing use the “no discharge” reporting code if Aero Finishing did not discharge wastewater or a specific pollutant during a given monitoring period. Aero Finishing is in violation of Condition S3.A.2 because it has reported the pH of the wastewater in its DMRs when there was no reported discharge from outfall 001 hundreds of times between August 2016 and April 2019. To the extent there was no discharge on these dates, Aero Finishing violated Condition S3.A.2 for failing to use the “no discharge” reporting code. These violations continue to occur every time that Aero Finishing reports “0” gpd and records a pH value and are reasonably likely to recur.

### 3. Copper

Condition S3.A of the Permit requires that Aero Finishing report the monitoring data for the copper concentrations in the wastewater that discharges via outfall 001 on monthly DMRs to Ecology. Aero Finishing is in violation of Condition S3.A because it has failed to report the copper concentrations from outfall 001 as required, including for the months of October, November, and December 2017 and January and February 2018.

Condition S3.A.2 of the Permit requires that Aero Finishing use the “no discharge” reporting code if Aero Finishing did not discharge wastewater or a specific pollutant during a given monitoring period. Aero Finishing is in violation of Condition S3.A.2 because it has reported copper as “0” mg/L in October and November 2017 and February 2018 when there was no reported discharge. Aero Finishing violated Condition S3.A.2 for failing to use the “no discharge” reporting code on each and every day on which there was discharge. These violations are reasonably likely to recur.

### 4. Chromium

Condition S3.A of the Permit requires that Aero Finishing report the monitoring data for the chromium concentrations in the wastewater that discharges via outfall 001 on monthly DMRs to Ecology. Aero Finishing is in violation of Condition S3.A because it failed to report the chromium concentrations from outfall 001 as required, including for the months of October, November, and December 2017, and January and February 2018. On July 30, 2018, Aero Finishing noted in the July DMR that chromium was “[a]bove allowable benchmark – reviewing process again. Taking more frequent samples in order to confirm the issue.” Conditions S3.A and S3.D require that Aero Finishing report a value for each day that sampling occurred. Aero Finishing is in violation of Conditions S3.A and S3.D because the “more frequent samples” were never reported on DMRs for the month of July or subsequent months. Aero Finishing also failed to report the average chromium value for the month of May 2018. These violations are reasonably likely to recur.

Condition S3.A.2 of the Permit requires that Aero Finishing use the “no discharge” reporting code if Aero Finishing did not discharge wastewater or a specific pollutant during a given monitoring period. Aero Finishing is in violation of Condition S3.A.2 because it has reported chromium as “0” mg/L in October and November 2017 and February 2018 when



there was no reported discharge. Aero Finishing violated Condition S3.A.2 for failing to use the “no discharge” reporting code on each and every day on which there was discharge. These violations are reasonably likely to recur.

5. Zinc

Condition S3.A of the Permit requires that Aero Finishing report the monitoring data for the zinc concentrations in the wastewater that discharges via outfall 001 on monthly DMRs to Ecology. Aero Finishing is in violation of Condition S3.A because it has failed to report the zinc from outfall 001 as required, including during October, November, and December 2017 and January and February 2018.

Condition S3.A.2 of the Permit requires that Aero Finishing use the “no discharge” reporting code if Aero Finishing did not discharge wastewater or a specific pollutant during a given monitoring period. Aero Finishing is in violation of Condition S3.A.2 because it has reported zinc as “0” mg/L in October and November 2017 and February 2018 when there was no reported discharge. To the extent there was no discharge on these dates, Aero Finishing violated Condition S3.A.2 for failing to use the “no discharge” reporting code. These violations are reasonably likely to recur.

6. Cadmium

Condition S3.A of the Permit requires that Aero Finishing report the monitoring data for the cadmium concentrations in the wastewater that discharges via outfall 001 to Ecology on DMRs once each six months. Aero Finishing is in violation of Condition S3.A because it has failed to report the cadmium from outfall 001 as required, including for the reporting periods of July through December 2016, January through June 2017, July through December 2017, and January through June 2018.

7. Lead

Condition S3.A of the Permit requires that Aero Finishing report the monitoring data for the lead concentrations in the wastewater that discharges via outfall 001 to Ecology on DMRs once each six months. Aero Finishing is in violation of Condition S3.A because it has failed to report the lead from outfall 001 as required, including for the reporting periods of July through December 2016, January through June 2017, and July through December 2017.

8. Nickel

Condition S3.A of the Permit requires that Aero Finishing report the monitoring data for the nickel concentrations in the wastewater that discharges via outfall 001 to Ecology on DMRs once each six months. Aero Finishing is in violation of Condition S3.A because it has failed to report the nickel from outfall 001 as required, including for the reporting periods of July through December 2016, January through June 2017, and July through December 2017.

9. Silver

Condition S3.A of the Permit requires that Aero finishing report the monitoring data for the silver concentrations in the wastewater that discharges via outfall 001 to Ecology on

DMRs once each six months. Aero Finishing is in violation of Condition S3.A because it has failed to report the silver from outfall 001 as required, including for the reporting periods of July through December 2016, January through June 2017, July through December 2017, and January through June 2018.

10. TTO

Condition S3.A of the Permit requires that Aero finishing report the monitoring data for the TTO in the wastewater that discharges via outfall 001 to Ecology once each six months. Aero Finishing is in violation of Condition S3.A because it has failed to report the TTO from outfall 001 or submit a TTO certification statement in lieu of testing as required, including for the reporting periods of July through December 2016, January through June 2017, July through December 2017, January through June 2018, and January through June 2019.

11. Cyanide

Condition S3.A of the Permit requires that Aero Finishing report the monitoring data for the cyanide concentrations in the wastewater that discharges via outfall 002 to Ecology once each six months. Aero Finishing is in violation of Condition S3.A because it has failed to report the cyanide of the wastewater from outfall 002 as required, including for the reporting periods of July through December 2016, January through June 2017, July through December 2017, and January through June 2019.

12. Reporting Permit Violations

Condition S3.E of the Permit requires that when Aero Finishing violates or is unable to comply with any permit condition, it must immediately take action to stop, contain, and cleanup unauthorized discharges or otherwise stop the noncompliance and correct the problem. Aero Finishing is in violation of Condition S3.E because nearly all of the violations occurred multiple times and are ongoing. These violations are identified in section II, III, and IV of this Notice of Intent to Sue and continue to occur.

Condition S3.E.a of the Permit requires that Aero Finishing report any noncompliance that may endanger the health or the environment immediately to Ecology's Regional Office and the City of Arlington.<sup>1</sup> Condition S3.E.b of the Permit requires that Aero Finishing report the noncompliances listed in the Permit to Ecology and the City of Arlington POTW within 24 hours. Condition S3.E.c of the Permit requires that Aero Finishing submit a written report within five days of the noncompliance. Aero Finishing is in violation of the above-listed conditions because it has failed to send timely notices of noncompliance for the violations described in this Notice of Intent to Sue.

Condition S3.F.b of the Permit requires that when Aero Finishing becomes aware that it failed to submit any relevant facts or submitted incorrect information in any report submitted to ecology, it must submit such facts or information promptly. Aero Finishing is in violation of Condition S3.F.b because it failed to promptly submit the correct information

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<sup>1</sup> The Permit states that Aero Finish should report noncompliance to the Mukilteo Water and Wastewater District, but this seems to be a mistake.

after Ecology notified Aero Finishing on several occasions, including in a letter dated October 16, 2018 in which Ecology notified Aero Finishing of improper reporting on February 18, 2018 for flow, chromium, copper, and zinc; not conducting an analysis for minimum pH on February 21 and 22, 2018; a missing the average value for chromium on May 1, 2018; and not conducting analysis for pH on July 2-25, 2018. Aero Finishing is also in violation of this condition because it failed to promptly submit the correct information after Ecology again notified Aero Finishing of reporting violations in a letter dated May 22, 2019, including for reporting and record keeping noncompliance for pH; incorrect reporting codes used in several places; using the code “H” for “greater than” for copper when the lab reports did not indicate that reporting code was needed; using the code “C” for “no discharge” for pH on March 16 and 17, 2018 when there was a discharge; and failing to use the code “C” for “no discharge” for pH when there was no discharge (January 5, 6, and 20 2019; February 2, 3, 9, 10, 17, and 23 2019; and March 2, 3, 9, 24, and 31 2019). Many of these violations have still not been corrected in Aero Finishing’s DMRs and are ongoing.

#### **D. Operation and Maintenance**

Condition S4 of the Permit requires Aero Finishing to at all times properly operate and maintain all facilities or systems of treatment and control which are installed to achieve compliance with the terms and conditions of the Permit. Aero Finishing is in violation of Condition S4 of the Permit because Aero Finishing has not properly operated its Facilities to achieve compliance with the discharge limits, as demonstrated by exceedances identified in section II of this Notice of Intent to Sue. In addition, and as part of these failures, Aero Finishing has not properly trained its wastewater treatment system operators as shown by deleting/losing data in July 2018 and March 2019; an “[e]rror found in processing chromium” and a “confirmed mistake in the process procedure by technician” in June 2018; and incorrectly reporting units on the March, April, May, and June 2018 DMRs. These violations occurred in the identified monitoring periods and in any preceding period during which Aero Finishing should have maintained its facilities and/or trained its employees but failed to do so and continue to occur.

Condition S4.B requires Aero Finishing to treat all industrial wastes containing pollutants and maintain the Facility by using best management practices (“BMPs”). Aero Finishing is in violation of this Condition because it has failed to apply BMPs to its discharges to the City of Arlington POTW, as indicated by the exceedances identified in section II of this Notice of Intent to Sue, including failing maintain a pH log of all batch discharges of wastewater.

#### **E. Toxic Organic Management Plan**

Condition S11.A of the Permit requires Aero Finishing to maintain a toxic organic management plan that includes a description of the procedures used by Aero Finishing to minimize the discharge of TTOs to the sanitary sewer. The Condition also requires Aero Finishing to review the toxic organic management plan at least annually and modify the plan, as necessary, to meet the provisions of the Permit. Aero Finishing has violated and continues to violate Condition S11.A of the Permit because Aero Finishing does not have a toxic organic management plan.

## II. Unpermitted Discharge of Industrial Stormwater

In addition to the violations listed above, Aero Finishing has also violated and continues to violate effluent standards and limitations under the CWA with respect to operations and discharges of stormwater associated with industrial activity from the Facility via point source to navigable waters without a National Pollutant Discharge Elimination System ("NPDES") permit authorizing those industrial stormwater discharges. Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, prohibit the discharge of pollutants, including stormwater associated with industrial activity, to waters of the United States, except as authorized by a NPDES permit.

Aero Finishing discharges industrial stormwater and pollutants to the Snohomish River via an unnamed waterway and Quil Ceda Creek. Aero Finishing discharges these pollutants from various conveyances at or adjacent to the Facility, including catch basins, storm sewer lines, pipes, and ditches that may connect to or comprise part of a public storm sewer system. On information and belief these pollutants include turbidity, suspended and dissolved solids, oxygen demanding substances, non-neutral pH, hydrocarbons, and metals, including copper and zinc. These violations of the CWA have occurred on each day from August 1, 2016, through the present during which there was a stormwater discharge from the Facility, generally including days on which there has been at least 0.1 inch of precipitation, and continue to occur. Precipitation data from the Arlington Weather Station USC00450257 identifying such days is appended to this notice of intent to sue. The violations alleged in this notice of intent to sue will continue until Aero Finishing obtains and comes into compliance with a NPDES permit authorizing such discharges.

## III. Conclusion

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$37,500 per day for each violation that occurred through November 2, 2015, and \$54,833 per day for each violation that occurred thereafter. 40 CFR § 19.4. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Waste Action Project believes that this Notice of Intent to Sue sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Aero Finishing under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed before the end of the 60-day notice period. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Sincerely,

**SMITH & LOWNEY, PLLC**

By:

A handwritten signature in dark ink, appearing to read "Richard A. Smith", is written over a horizontal line.

Richard A. Smith

Katherine Brennan

cc: Andrew Wheeler, Administrator, U.S. EPA  
Chris Hladick, Region 10 Administrator, U.S. EPA  
Maia Bellon, Director, Washington Department of Ecology  
Jeff Perry, Registered Agent (18640 59th Dr. NE, Arlington, WA 98223)

Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/1/16	0.05	9/10/16	0	10/20/16	0.81	11/29/16	0.16
8/2/16	0.05	9/11/16	0	10/21/16	0.04	11/30/16	0.98
8/3/16	0	9/12/16	0	10/22/16	0.04	12/1/16	0.21
8/4/16	0	9/13/16	0	10/23/16	0	12/2/16	0.35
8/5/16	0	9/14/16	0	10/24/16	0.24	12/3/16	0.38
8/6/16	0	9/15/16	0	10/25/16	0.04	12/4/16	0.17
8/7/16	0	9/16/16	0.22	10/26/16	0.59	12/5/16	0
8/8/16	0.02	9/17/16	0.68	10/27/16	0.16	12/6/16	0
8/9/16	0	9/18/16	0.09	10/28/16	0	12/7/16	0
8/10/16	0	9/19/16	0.1	10/29/16	0.25	12/8/16	0.16
8/11/16	0	9/20/16	0	10/30/16	0.17	12/9/16	0.43
8/12/16	0	9/21/16	0	10/31/16	0.69	12/10/16	0.11
8/13/16	0	9/22/16	0	11/1/16	0.28	12/11/16	0.35
8/14/16	0	9/23/16	0.2	11/2/16	0.3	12/12/16	0
8/15/16	0	9/24/16	0	11/3/16	0	12/13/16	0
8/16/16	0	9/25/16	0	11/4/16	0.18	12/14/16	0
8/17/16	0	9/26/16	0	11/5/16	0.66	12/15/16	0
8/18/16	0	9/27/16	0	11/6/16	0.05	12/16/16	0
8/19/16	0	9/28/16	0	11/7/16	0	12/17/16	0.2
8/20/16	0	9/29/16	0	11/8/16	0	12/18/16	0.12
8/21/16	0	9/30/16	0.03	11/9/16	0.12	12/19/16	0.41
8/22/16	0	10/1/16	0.25	11/10/16	0	12/20/16	0
8/23/16	0	10/2/16	0	11/11/16	0.05	12/21/16	0
8/24/16	0	10/3/16	0.15	11/12/16	0.69	12/22/16	0.49
8/25/16	0	10/4/16	0.32	11/13/16	0.53	12/23/16	0.12
8/26/16	0	10/5/16	0.17	11/14/16	0.66	12/24/16	0
8/27/16	0	10/6/16	0.39	11/15/16	1.67	12/25/16	0
8/28/16	0	10/7/16	0.11	11/16/16	0.04	12/26/16	0.35
8/29/16	0	10/8/16	0.67	11/17/16	0	12/27/16	0.42
8/30/16	0	10/9/16	0.02	11/18/16	0	12/28/16	0.04
8/31/16	0.09	10/10/16	0	11/19/16	0.32	12/29/16	0.27
9/1/16	0.14	10/11/16	0	11/20/16	0.2	12/30/16	0
9/2/16	0.17	10/12/16	0.09	11/21/16	0.03	12/31/16	0.31
9/3/16	0.03	10/13/16	0.91	11/22/16	0.56	1/1/17	0
9/4/16	0	10/14/16	0.62	11/23/16	0.57	1/2/17	0
9/5/16	0.07	10/15/16	0.66	11/24/16	1.21	1/3/17	0
9/6/16	0	10/16/16	0.5	11/25/16	0.53	1/4/17	0
9/7/16	0.19	10/17/16	0.33	11/26/16	0.67	1/5/17	0
9/8/16	0	10/18/16	0.05	11/27/16	0.42	1/6/17	0
9/9/16	0	10/19/16	1.11	11/28/16	0.35	1/7/17	0



Date	Inches	Date	Inches	Date	Inches	Date	Inches
1/8/17	0.29	2/17/17	0	3/29/17	0.52	5/8/17	0
1/9/17	0	2/18/17	0.27	3/30/17	0	5/9/17	0
1/10/17	0	2/19/17	0.1	3/31/17	0.13	5/10/17	0.07
1/11/17	0	2/20/17	0.2	4/1/17	0.18	5/11/17	0.2
1/12/17	0	2/21/17	0.05	4/2/17	0	5/12/17	0.23
1/13/17	0	2/22/17	0	4/3/17	0	5/13/17	0.21
1/14/17	0	2/23/17	0.22	4/4/17	0.06	5/14/17	0.49
1/15/17	0	2/24/17	0	4/5/17	0.51	5/15/17	1.05
1/16/17	0.14	2/25/17	0.52	4/6/17	0.42	5/16/17	0.12
1/17/17	0.38	2/26/17	0.16	4/7/17	0.34	5/17/17	0
1/18/17	0.79	2/27/17	0.22	4/8/17	0.03	5/18/17	0
1/19/17	0.17	2/28/17	0.05	4/9/17	0.25	5/19/17	0
1/20/17	0.03	3/1/17	0.08	4/10/17	0.03	5/20/17	0
1/21/17	0.02	3/2/17	0.25	4/11/17	0.3	5/21/17	0
1/22/17	0	3/3/17	0.71	4/12/17	0.47	5/22/17	0
1/23/17	0	3/4/17	0.13	4/13/17	0.05	5/23/17	0
1/24/17	0.07	3/5/17	0.49	4/14/17	0.05	5/24/17	0.02
1/25/17	0.02	3/6/17	0.4	4/15/17	0	5/25/17	0
1/26/17	0	3/7/17	0.68	4/16/17	0	5/26/17	0
1/27/17	0	3/8/17	0.1	4/17/17	0.07	5/27/17	0
1/28/17	0	3/9/17	0.29	4/18/17	0	5/28/17	0
1/29/17	0	3/10/17	0.19	4/19/17	0.41	5/29/17	0
1/30/17	0	3/11/17	0.14	4/20/17	0.31	5/30/17	0.13
1/31/17	0	3/12/17	0.27	4/21/17	0	5/31/17	0.08
2/1/17	0	3/13/17	0.51	4/22/17	0.11	6/1/17	0
2/2/17	0.06	3/14/17	0.18	4/23/17	0.17	6/2/17	0
2/3/17	0.34	3/15/17	0.85	4/24/17	0	6/3/17	0
2/4/17	0.39	3/16/17	0	4/25/17	0.3	6/4/17	0
2/5/17	0.46	3/17/17	0.66	4/26/17	0.51	6/5/17	0
2/6/17	0	3/18/17	0.53	4/27/17	0.06	6/6/17	0
2/7/17	0	3/19/17	0	4/28/17	0	6/7/17	0.17
2/8/17	0.7	3/20/17	0.08	4/29/17	0.08	6/8/17	0.24
2/9/17	0.36	3/21/17	0.05	4/30/17	0	6/9/17	0
2/10/17	0	3/22/17	0.28	5/1/17	0	6/10/17	0
2/11/17	0	3/23/17	0.2	5/2/17	0.46	6/11/17	0
2/12/17	0	3/24/17	0.32	5/3/17	0.02	6/12/17	0
2/13/17	0	3/25/17	0.03	5/4/17	1.18	6/13/17	0.07
2/14/17	0.33	3/26/17	0.35	5/5/17	0.13	6/14/17	0.06
2/15/17	0.72	3/27/17	0.11	5/6/17	0	6/15/17	0.19
2/16/17	0.15	3/28/17	0.64	5/7/17	0	6/16/17	0

Date	Inches	Date	Inches	Date	Inches	Date	Inches
6/17/17	0.09	7/27/17	0	9/5/17	0	10/15/17	0
6/18/17	0.12	7/28/17	0	9/6/17	0	10/16/17	0.05
6/19/17	0.1	7/29/17	0	9/7/17	0	10/17/17	0.3
6/20/17	0.07	7/30/17	0	9/8/17	0	10/18/17	1.31
6/21/17	0	7/31/17	0	9/9/17	0.1	10/19/17	0.26
6/22/17	0	8/1/17	0	9/10/17	0	10/20/17	0.75
6/23/17	0	8/2/17	0	9/11/17	0	10/21/17	0.67
6/24/17	0	8/3/17	0	9/12/17	0	10/22/17	0
6/25/17	0	8/4/17	0	9/13/17	0	10/23/17	0
6/26/17	0	8/5/17	0	9/14/17	0	10/24/17	0
6/27/17	0	8/6/17	0	9/15/17	0	10/25/17	0.05
6/28/17	0	8/7/17	0	9/16/17	0	10/26/17	0
6/29/17	0	8/8/17	0	9/17/17	0.42	10/27/17	0
6/30/17	0	8/9/17	0	9/18/17	0.25	10/28/17	0
7/1/17	0	8/10/17	0	9/19/17	0.15	10/29/17	0
7/2/17	0	8/11/17	0	9/20/17	0	10/30/17	0
7/3/17	0	8/12/17	0.05	9/21/17	0	10/31/17	0.04
7/4/17	0	8/13/17	0.06	9/22/17	0	11/1/17	0.09
7/5/17	0	8/14/17	0	9/23/17	0	11/2/17	1.27
7/6/17	0	8/15/17	0	9/24/17	0.01	11/3/17	0.07
7/7/17	0	8/16/17	0	9/25/17	0.06	11/4/17	0.45
7/8/17	0	8/17/17	0	9/26/17	0	11/5/17	0
7/9/17	0	8/18/17	0	9/27/17	0	11/6/17	0
7/10/17	0	8/19/17	0	9/28/17	0	11/7/17	0
7/11/17	0	8/20/17	0	9/29/17	0.12	11/8/17	0.07
7/12/17	0	8/21/17	0	9/30/17	0.16	11/9/17	0.1
7/13/17	0	8/22/17	0	10/1/17	0.01	11/10/17	0
7/14/17	0	8/23/17	0	10/2/17	0	11/11/17	0.47
7/15/17	0	8/24/17	0	10/3/17	0	11/12/17	0.77
7/16/17	0	8/25/17	0	10/4/17	0	11/13/17	0.42
7/17/17	0	8/26/17	0	10/5/17	0	11/14/17	1.02
7/18/17	0	8/27/17	0	10/6/17	0.06	11/15/17	0.1
7/19/17	0	8/28/17	0	10/7/17	0.03	11/16/17	0.29
7/20/17	0	8/29/17	0	10/8/17	0	11/17/17	0.02
7/21/17	0	8/30/17	0	10/9/17	0	11/18/17	0
7/22/17	0	8/31/17	0	10/10/17	0.11	11/19/17	0.55
7/23/17	0	9/1/17	0	10/11/17	0.05	11/20/17	0.5
7/24/17	0	9/2/17	0	10/12/17	0.41	11/21/17	0.45
7/25/17	0	9/3/17	0	10/13/17	0.1	11/22/17	0.52
7/26/17	0	9/4/17	0	10/14/17	0	11/23/17	0.58

Date	Inches	Date	Inches	Date	Inches	Date	Inches
11/24/17	0.03	1/3/18	0.03	2/12/18	0	3/24/18	0.3
11/25/17	0.27	1/4/18	0.2	2/13/18	0.61	3/25/18	0.1
11/26/17	0.83	1/5/18	0.5	2/14/18	0.25	3/26/18	0.51
11/27/17	0.03	1/6/18	0.1	2/15/18	0.19	3/27/18	0.5
11/28/17	0.52	1/7/18	0.87	2/16/18	1.01	3/28/18	0.07
11/29/17	0.16	1/8/18	0.52	2/17/18	1.24	3/29/18	0.22
11/30/17	0.61	1/9/18	0.1	2/18/18	0	3/30/18	0.08
12/1/17	0.25	1/10/18	0.28	2/19/18	0	3/31/18	0.11
12/2/17	0.56	1/11/18	0.88	2/20/18	0	4/1/18	0.26
12/3/17	0.08	1/12/18	0.38	2/21/18	0	4/2/18	0.1
12/4/17	0.01	1/13/18	0.04	2/22/18	0	4/3/18	0.05
12/5/17	0	1/14/18	0	2/23/18	0.39	4/4/18	0.57
12/6/17	0	1/15/18	0.14	2/24/18	0.2	4/5/18	0.46
12/7/17	0	1/16/18	0	2/25/18	0.62	4/6/18	0.37
12/8/17	0	1/17/18	0.37	2/26/18	0	4/7/18	0.34
12/9/17	0	1/18/18	0.11	2/27/18	0.05	4/8/18	0.52
12/10/17	0	1/19/18	0.44	2/28/18	0.33	4/9/18	0
12/11/17	0	1/20/18	0.13	3/1/18	0.1	4/10/18	0.19
12/12/17	0	1/21/18	0.37	3/2/18	0	4/11/18	0.37
12/13/17	0	1/22/18	0	3/3/18	0	4/12/18	0.12
12/14/17	0	1/23/18	0.52	3/4/18	0.1	4/13/18	0.59
12/15/17	0.3	1/24/18	0.14	3/5/18	0	4/14/18	1.32
12/16/17	0.33	1/25/18	0.1	3/6/18	0.07	4/15/18	0.24
12/17/17	1.49	1/26/18	0.41	3/7/18	0.07	4/16/18	1.12
12/18/17	0.65	1/27/18	0.12	3/8/18	0.48	4/17/18	0.17
12/19/17	0.36	1/28/18	0.17	3/9/18	0	4/18/18	0
12/20/17	0	1/29/18	0.92	3/10/18	0	4/19/18	0
12/21/17	0.11	1/30/18	0.03	3/11/18	0	4/20/18	0.13
12/22/17	0	1/31/18	0.13	3/12/18	0	4/21/18	0
12/23/17	0	2/1/18	0.51	3/13/18	0.16	4/22/18	0
12/24/17	0.14	2/2/18	0.65	3/14/18	0	4/23/18	0
12/25/17	0	2/3/18	2.12	3/15/18	0	4/24/18	0
12/26/17	0	2/4/18	1.14	3/16/18	0.09	4/25/18	0
12/27/17	0.1	2/5/18	0.59	3/17/18	0.13	4/26/18	0
12/28/17	0.09	2/6/18	0.17	3/18/18	0	4/27/18	0.16
12/29/17	0.71	2/7/18	0.09	3/19/18	0	4/28/18	0.33
12/30/17	0.08	2/8/18	0.5	3/20/18	0	4/29/18	0.13
12/31/17	0	2/9/18	0.05	3/21/18	0.08	4/30/18	0.06
1/1/18	0	2/10/18	0	3/22/18	0.42	5/1/18	0
1/2/18	0	2/11/18	0	3/23/18	0.52	5/2/18	0

Date	Inches	Date	Inches	Date	Inches	Date	Inches
5/3/18	0	6/12/18	0.06	7/22/18	0	8/31/18	0
5/4/18	0	6/13/18	0.32	7/23/18	0	9/1/18	0
5/5/18	0	6/14/18	0	7/24/18	0	9/2/18	0
5/6/18	0	6/15/18	0	7/25/18	0	9/3/18	0
5/7/18	0	6/16/18	0	7/26/18	0	9/4/18	0
5/8/18	0.31	6/17/18	0	7/27/18	0	9/5/18	0
5/9/18	0	6/18/18	0	7/28/18	0	9/6/18	0
5/10/18	0.13	6/19/18	0	7/29/18	0	9/7/18	0
5/11/18	0	6/20/18	0	7/30/18	0	9/8/18	0.01
5/12/18	0	6/21/18	0	7/31/18	0	9/9/18	0.74
5/13/18	0	6/22/18	0	8/1/18	0.01	9/10/18	1.06
5/14/18	0	6/23/18	0	8/2/18	0.02	9/11/18	0.11
5/15/18	0	6/24/18	0.42	8/3/18	0	9/12/18	0.25
5/16/18	0	6/25/18	0.05	8/4/18	0	9/13/18	0.71
5/17/18	0	6/26/18	0	8/5/18	0	9/14/18	0.32
5/18/18	0	6/27/18	0	8/6/18	0	9/15/18	0.23
5/19/18	0.09	6/28/18	0	8/7/18	0	9/16/18	0.48
5/20/18	0.08	6/29/18	0.02	8/8/18	0	9/17/18	0
5/21/18	0	6/30/18	0.4	8/9/18	0	9/18/18	0
5/22/18	0	7/1/18	0.11	8/10/18	0	9/19/18	0
5/23/18	0	7/2/18	0.02	8/11/18	0.36	9/20/18	0
5/24/18	0	7/3/18	0	8/12/18	0.04	9/21/18	0.13
5/25/18	0	7/4/18	0	8/13/18	0.01	9/22/18	0.9
5/26/18	0	7/5/18	0	8/14/18	0	9/23/18	0
5/27/18	0	7/6/18	0	8/15/18	0	9/24/18	0
5/28/18	0	7/7/18	0	8/16/18	0	9/25/18	0
5/29/18	0	7/8/18	0	8/17/18	0	9/26/18	0
5/30/18	0	7/9/18	0.05	8/18/18	0	9/27/18	0
5/31/18	0	7/10/18	0	8/19/18	0	9/28/18	0
6/1/18	0	7/11/18	0	8/20/18	0	9/29/18	0.17
6/2/18	0	7/12/18	0	8/21/18	0	9/30/18	0.02
6/3/18	0.13	7/13/18	0	8/22/18	0	10/1/18	0.15
6/4/18	0	7/14/18	0	8/23/18	0.01	10/2/18	0.18
6/5/18	0	7/15/18	0	8/24/18	0	10/3/18	0
6/6/18	0	7/16/18	0	8/25/18	0	10/4/18	0
6/7/18	0	7/17/18	0	8/26/18	0.1	10/5/18	0.19
6/8/18	0.45	7/18/18	0	8/27/18	0	10/6/18	0
6/9/18	0.27	7/19/18	0	8/28/18	0	10/7/18	0.1
6/10/18	0.16	7/20/18	0	8/29/18	0	10/8/18	0.37
6/11/18	0	7/21/18	0	8/30/18	0	10/9/18	0

Date	Inches	Date	Inches	Date	Inches	Date	Inches
10/10/18	0	11/19/18	0	12/29/18	0.53	2/7/19	0
10/11/18	0	11/20/18	0	12/30/18	0.08	2/8/19	0.26
10/12/18	0	11/21/18	0.51	12/31/18	0	2/9/19	0
10/13/18	0	11/22/18	0.46	1/1/19	0	2/10/19	0.25
10/14/18	0	11/23/18	0.4	1/2/19	0.05	2/11/19	0.74
10/15/18	0	11/24/18	0	1/3/19	0.24	2/12/19	0.36
10/16/18	0	11/25/18	0.1	1/4/19	0	2/13/19	0
10/17/18	0	11/26/18	0.51	1/5/19	0.42	2/14/19	0.25
10/18/18	0	11/27/18	0.05	1/6/19	0.46	2/15/19	0
10/19/18	0	11/28/18	0.12	1/7/19	0	2/16/19	0.12
10/20/18	0	11/29/18	0.08	1/8/19	0.18	2/17/19	0
10/21/18	0	11/30/18	0.11	1/9/19	0.35	2/18/19	0.04
10/22/18	0	12/1/18	0	1/10/19	0.03	2/19/19	0.34
10/23/18	0.12	12/2/18	0	1/11/19	0	2/20/19	0
10/24/18	0	12/3/18	0	1/12/19	0	2/21/19	0
10/25/18	0.51	12/4/18	0	1/13/19	0	2/22/19	0.47
10/26/18	0.55	12/5/18	0	1/14/19	0	2/23/19	0.15
10/27/18	0.75	12/6/18	0	1/15/19	0	2/24/19	0
10/28/18	0.14	12/7/18	0.3	1/16/19	0.08	2/25/19	0
10/29/18	0	12/8/18	0	1/17/19	0.07	2/26/19	0
10/30/18	0.33	12/9/18	0.59	1/18/19	0.37	2/27/19	0
10/31/18	0.57	12/10/18	0.21	1/19/19	0	2/28/19	0
11/1/18	1.11	12/11/18	0.3	1/20/19	0	3/1/19	0
11/2/18	0.6	12/12/18	0.25	1/21/19	0.03	3/2/19	0
11/3/18	0.83	12/13/18	0	1/22/19	0.83	3/3/19	0
11/4/18	0.14	12/14/18	0.31	1/23/19	0.05	3/4/19	0
11/5/18	0.65	12/15/18	0.22	1/24/19	0	3/5/19	0
11/6/18	0.05	12/16/18	0.19	1/25/19	0	3/6/19	0.3
11/7/18	0	12/17/18	0.11	1/26/19	0	3/7/19	0.67
11/8/18	0	12/18/18	0.2	1/27/19	0	3/8/19	0
11/9/18	0.16	12/19/18	0.39	1/28/19	0	3/9/19	0
11/10/18	0	12/20/18	0.18	1/29/19	0	3/10/19	0
11/11/18	0	12/21/18	0	1/30/19	0	3/11/19	1.15
11/12/18	0	12/22/18	0.32	1/31/19	0.05	3/12/19	0.08
11/13/18	0.12	12/23/18	0.08	2/1/19	0.22	3/13/19	0
11/14/18	0.11	12/24/18	0	2/2/19	0.3	3/14/19	0.07
11/15/18	0.32	12/25/18	0.02	2/3/19	0.61	3/15/19	0
11/16/18	0	12/26/18	0.23	2/4/19	0.11	3/16/19	0
11/17/18	0	12/27/18	0.03	2/5/19	0	3/17/19	0
11/18/18	0	12/28/18	1.22	2/6/19	0	3/18/19	0

Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/19/19	0	4/28/19	0	6/7/19	0.27	7/17/19	0.22
3/20/19	0	4/29/19	0	6/8/19	0.03	7/18/19	0
3/21/19	0	4/30/19	0	6/9/19	0	7/19/19	0
3/22/19	0.03	5/1/19	0.05	6/10/19	0	7/20/19	0
3/23/19	0	5/2/19	0.02	6/11/19	0	7/21/19	0
3/24/19	0	5/3/19	0	6/12/19	0	7/22/19	0
3/25/19	0.24	5/4/19	0	6/13/19	0	7/23/19	0.05
3/26/19	0	5/5/19	0	6/14/19	0	7/24/19	0
3/27/19	0	5/6/19	0	6/15/19	0	7/25/19	0
3/28/19	0	5/7/19	0	6/16/19	0	7/26/19	0
3/29/19	0	5/8/19	0	6/17/19	0.02	7/27/19	0
3/30/19	0	5/9/19	0	6/18/19	0.01	7/28/19	0
3/31/19	0	5/10/19	0	6/19/19	0.09	7/29/19	0
4/1/19	0	5/11/19	0	6/20/19	0	7/30/19	0
4/2/19	0.09	5/12/19	0	6/21/19	0	7/31/19	0
4/3/19	0	5/13/19	0.01	6/22/19	0	8/1/19	0.03
4/4/19	0.09	5/14/19	0.06	6/23/19	0	8/2/19	0
4/5/19	0.24	5/15/19	0.03	6/24/19	0	8/3/19	0
4/6/19	0.29	5/16/19	0.54	6/25/19	0.02	8/4/19	0.03
4/7/19	0	5/17/19	0.19	6/26/19	0.44	8/5/19	0
4/8/19	0.17	5/18/19	0	6/27/19	0.05	8/6/19	0
4/9/19	0.22	5/19/19	0	6/28/19	0	8/7/19	0
4/10/19	0.6	5/20/19	0.13	6/29/19	0	8/8/19	0
4/11/19	0.47	5/21/19	0	6/30/19	0	8/9/19	0
4/12/19	0.08	5/22/19	0	7/1/19	0	8/10/19	0.12
4/13/19	0.47	5/23/19	0	7/2/19	0.01	8/11/19	0.63
4/14/19	0.52	5/24/19	0.06	7/3/19	0	8/12/19	0
4/15/19	0	5/25/19	0.19	7/4/19	0	8/13/19	0
4/16/19	0.05	5/26/19	0	7/5/19	0	8/14/19	0
4/17/19	0.1	5/27/19	0	7/6/19	0	8/15/19	0
4/18/19	0.56	5/28/19	0	7/7/19	0	8/16/19	0
4/19/19	0.26	5/29/19	0	7/8/19	0	8/17/19	0
4/20/19	0	5/30/19	0	7/9/19	0.09	8/18/19	0
4/21/19	0	5/31/19	0	7/10/19	0.09	8/19/19	0
4/22/19	0.09	6/1/19	0	7/11/19	0	8/20/19	0.06
4/23/19	0.02	6/2/19	0	7/12/19	0	8/21/19	0.34
4/24/19	0	6/3/19	0	7/13/19	0	8/22/19	0
4/25/19	0	6/4/19	0	7/14/19	0	8/23/19	0
4/26/19	0	6/5/19	0	7/15/19	0.22	8/24/19	0
4/27/19	0	6/6/19	0.24	7/16/19	0.05	8/25/19	0



Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/26/19	0						
8/27/19	0						
8/28/19	0						
8/29/19	0.05						
8/30/19	0						
8/31/19	0						
9/21/19	0.07						
9/22/19	0.3						
9/23/19	0.46						
9/30/19	0						
10/2/19	0						
10/3/19	0.07						
10/5/19	0						
10/6/19	0.03						
10/8/19	0.13						
10/9/19	0						
10/13/19	0						
10/14/19	0						
10/15/19	0.09						
10/20/19	0.32						
10/21/19	2.3						
10/23/19	0						
10/24/19	0						
11/4/19	0						
11/5/19	0						
11/6/19	0						
11/7/19	0						
11/12/19	0.06						
11/13/19	0.02						
11/17/19							
11/18/19	0.79						
11/19/19	0						
11/25/19	0.04						
11/29/19							
11/30/19	0						
12/1/19	0						
12/2/19	0.02						